

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF OHIO  
EASTERN DIVISION**

**IN RE NATIONAL PRESCRIPTION  
OPIATE LITIGATION**

**MDL No. 2804  
Case No. 17-md-2804  
Judge Dan Aaron Polster**

**This document relates to:**

*The County of Cuyahoga v. Purdue  
Pharma L.P., et al.*, Case No. 17-OP-45004

*The County of Summit, Ohio, et al. v.  
Purdue Pharma L.P. et al.*,  
Case No. 18-OP-45090

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**NOTICE OF SERVICE OF MANUFACTURERS' JOINT MOTION FOR SUMMARY  
JUDGMENT ON PLAINTIFFS' RICO, OCPA, AND CONSPIRACY CLAIMS**

Pursuant to the Directions Regarding Filing of Briefs Under Seal, ECF No. 1719, Manufacturers<sup>1</sup> hereby provide notice that on June 28, 2019, they served unredacted copies of the following documents on all Parties, the Court, and the Special Masters:

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<sup>1</sup> "Manufacturers" refers to Purdue Pharma, L.P., Purdue Pharma, Inc., The Purdue Frederick Company, Inc., Endo Health Solutions Inc., Endo Pharmaceuticals Inc., Par Pharmaceutical, Inc., Par Pharmaceutical Companies, Inc. (incorrectly named as "Par Pharmaceutical Companies, Inc. f/k/a Par Pharmaceutical Holdings, Inc.), Janssen Pharmaceuticals, Inc., Janssen Pharmaceutica, Inc. n/k/a Janssen Pharmaceuticals, Inc., Ortho-McNeil-Janssen Pharmaceuticals, Inc., n/k/a Janssen Pharmaceuticals, Inc., Johnson & Johnson, Noramco, Inc., Teva Pharmaceutical Industries Ltd., Teva Pharmaceuticals USA, Inc, Cephalon, Inc., Allergan plc f/k/a Actavis plc, Allergan Finance, LLC, f/k/a Actavis, Inc., f/k/a Watson Pharmaceuticals, Inc., Allergan Sales, LLC, Allergan USA, Inc., Watson Laboratories, Inc., Actavis LLC, Actavis Pharma, Inc. f/k/a Watson Pharma, Inc, Mallinckrodt, plc, Mallinckrodt LLC, SpecGx LLC, Allergan Sales, LLC, Allergan USA, Inc., Warner Chilcott Company, LLC, Actavis South Atlantic LLC, Actavis Elizabeth LLC, Actavis Mid Atlantic LLC, Actavis Totowa LLC, Actavis Kadian LLC, Actavis Laboratories UT, Inc. f/k/a Watson Laboratories, Inc.-Salt Lake City, and Actavis Laboratories FL, Inc., f/k/a Watson Laboratories, Inc.-Florida.

Teva Pharmaceutical Industries Ltd., Allergan plc, and Mallinckrodt plc are respectively an Israeli corporation, Irish holding company, and Irish company that are not subject to and contest personal jurisdiction for the reasons explained in their pending motions to dismiss for lack of personal jurisdiction; they are specially appearing to join this motion as a result of the Court's deadline to

- Manufacturers' Joint Motion for Summary Judgment On Plaintiffs' RICO, OCPA, and Conspiracy Claims;
- Memorandum in Support of Manufacturers' Joint Motion for Summary Judgment On Plaintiffs' RICO, OCPA, and Conspiracy Claims;
- Declaration of Will Sachse in Support of Manufacturers' Joint Motion for Summary Judgment On Plaintiffs' RICO, OCPA, and Conspiracy Claims, along with the corresponding exhibits;
- [Proposed] Order Granting Manufacturers' Joint Motion for Summary Judgment On Plaintiffs' RICO, OCPA, and Conspiracy Claims;
- Summary Sheet for Manufacturers' Joint Motion for Summary Judgment On Plaintiffs' RICO, OCPA, and Conspiracy Claims (also attached hereto as Exhibit A).

Dated: June 28, 2019

Respectfully submitted,

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file dispositive and Daubert motions, and, thus, they do not waive and expressly preserve their pending personal jurisdiction challenges.

On June 10, 2019, Insys Therapeutics, Inc. and its affiliates each filed a voluntary case under chapter 11 of United States Bankruptcy Code in the United States Bankruptcy Court for the District of Delaware, which cases are being jointly administered under Case No. 19-11292 (KG). In light of this bankruptcy proceeding, Insys does not join any of the Daubert motions for summary judgment motions to be filed in the MDL Track One cases.

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**CERTIFICATE OF SERVICE**

I, Lindsey Cohan, hereby certify that the foregoing document was served via the Court's ECF system to all counsel of record.

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